

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

XIAOLIN CHI and FAYUN LUO, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff(s),

vs.

QIAO XING UNIVERSAL RESOURCES, INC.,
RUI LIN WU, ZHI YANG WU, JIUJIU JIANG, and
AIJUN JIANG,

Defendants.

CASE No.: 1:12-cv-00045-WAL-GWC

CLASS ACTION

CLASS REPRESENTATIVE'S MOTION FOR DEFAULT JUDGMENT

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Class Counsel

PLEASE TAKE NOTICE that Class Representative Xiaolin Chi (“Chi” or “Class Representative”), by and through his counsel, The Rosen Law Firm, P.A, and the Law Offices of Kevin A Rames, P.C., respectfully move this Court, before the Honorable Anne E. Thompson, United States District Judge, for an Order:

- (a) pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, for the entry of a default judgment against Defendants Qiao Xing Universal Resources, Inc. (“Xing”), Rui Lin Wu (“R. Wu”), Zhi Yang Wu (Z. Wu”), and Jiujiu Jiang (“Jiang”) for eleven million seventy four thousand, two hundred and one dollars (\$11,074,201); and
- (b) granting such other and further relief as the Court may deem just and proper.

In support of this Motion, Class Representative submits herewith:

- (1) a Memorandum of Law in Support of Class Representative’s Motion for Default Judgment;
- (2) the Declaration of Kevin Rames and exhibits attached thereto; and
- (3) the Report of Dr. Adam Werner and exhibits attached thereto.

Dated: November 21, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 21st day of November, 2017, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Kevin A. Rames